

1 whether an extension is warranted. Thus, even if you have
2 reached a conclusion about engineering software or
3 preclusion, you need to consider other factors, as well.

4 For example, you are undoubtedly aware that other
5 broadband Internet access technologies such as DSL are
6 actively marketing their services in many areas. You and we
7 need to consider the effect of a four or nine-month delay in
8 the filing window on the timing of FCC grants, the rolling
9 out of service, and the competitive position of two-way
10 wireless systems vis a vis those competitive technologies.

11 In addition, you are also probably aware that
12 proponents of third generation wireless and satellite
13 technologies have argued that the ITFS MMDS band is
14 under-utilized and would be better utilized by their
15 services.

16 Indeed, the satellite industry association has
17 already filed a petition to allocate the top and bottom 20
18 megahertz portions of our band to mobile satellite.
19 Therefore, you and we need to consider whether and how a
20 delay of the filing window would support these parties'
21 arguments that ITFS and MMDS once again cannot get its act
22 together, and that the 2.5 gigahertz band should be better
23 turned over to their stewardship.

24 There may be other factors to consider, as well,

1 and we certainly urge you to keep this in mind. In making
2 these comments, we're not intending to argue that the window
3 should not be extended, but simply to emphasize that the
4 issues are or may be more complicated than the answer to a
5 particular question about engineering software or
6 preclusion. We urge you, once again, when these conferences
7 are over, to consider all the relevant factors in deciding
8 whether to support or oppose the extension.

9 With these comments in mind, I'm going to turn the
10 session over to our Moderator, John Schwartz. As you all
11 probably know, John is the founder and president of several
12 non-profit educational organizations that operate ITFS
13 stations throughout the country. John is an active member
14 of the NIA Board of Directors, and has invested much time
15 and energy exploring two-way ITFS opportunities and issues.
16 John has generously agreed to put together and lead this
17 audio conference. John?

18 MR. SCHWARTZ: Thanks very much, Todd. Let me
19 mention a little bit about the format. We're going to have
20 presentations of five minutes apiece from each of our five
21 guests. We're going to follow each of these short
22 presentations with a brief period for questions directed to
23 that presenter. After we run through that, we're going to
24 have a section for questions from the audience, which could

1 be directed to any individual. And then, we're going to
2 have a section for questions which the panelists will ask
3 each other, followed by concluding comments from each.

4 You will want to know how to ask a question
5 because it may be that you want to get yourself queued up.
6 Operator, can you tell participants how it is that they
7 queue themselves up to ask a question?

8 OPERATOR: Yes, absolutely. To ask a question
9 today, you'll press the start or asterisk key, followed by
10 the digit 1 on your touch tone telephone. Once again, to
11 ask a question, that will be star.

12 MR. SCHWARTZ: I'm going to have questions ready
13 in case that there is any lag time. But, of course, we will
14 give preference to audience questions.

15 I also want to point out that the NIA web site has
16 useful information. The web site is www.itfs.org. We have
17 two conference papers from participants posted, and bios of
18 all of our presenters.

19 Let me introduce our first presenter. That's John
20 Hidle of Carl T. Jones Consulting Engineers. John and Carl
21 T. Jones were engineers to helped in the presentation of the
22 ITFS 20/20 petition to delay the filing window. John's
23 complete biography can be found on the NIA website. Let me
24 mention that you'd go to the main page at www.itfs.org, and

1 then, there's a prominent link that says "Articles and
2 Information on Petitions to Delay the Two-Way Filing
3 Window." Click on that link, and you'll get all the bios.
4 John?

5 MR. HIDLE: Yes. How are you today?

6 MR. SCHWARTZ: Great. Thank you very much for
7 participating.

8 MR. HIDLE: It's my pleasure. I'd like to start
9 out by saying that Carl T. Jones Corporation has worked on
10 ITFS projects for many, many years. But this particular
11 project we started working on almost two years ago. And in
12 the process of doing so, we have followed it very carefully.
13 We have managed to evaluate the software that's available,
14 and we -- after we found Appendix D, we looked at it and
15 decided that we'd better start finding some software that
16 would allow us to accomplish these complex calculations.

17 And it was not until just recently, early this
18 year when we became aware of the CelPlan wireless global
19 technologies, although we had been evaluating ADX MMDS
20 modules since back in April of 1999. And we -- once we
21 realized that there was a second package available, we
22 sought to obtain access to it, and we did.

23 We had eight people participate in a three-day
24 training program. And then, we of course bought initially

1 two complete license packages, and we have been using those
2 since we obtained them in mid-April to go about preparing
3 applications for our client. And we have been working since
4 then in five markets so far to prepare applications. But,
5 unfortunately, we have come to the conclusion that we are
6 not -- we are calculating that we will not be able to
7 complete an adequate number of applications in the time that
8 remains.

9 We have, in the process, identified some
10 situations with both the software packages which lead us to
11 believe, in our attempt on almost -- well, actually, a seven
12 day a week attempt here to run our designs through the
13 software, and we are finding that the run time is extensive.
14 And in a simple calculation, we believe that we are just
15 not going to be able to achieve the volume of applications
16 that we need to achieve for ITFS clients in the time
17 remaining.

18 So in that regard, we believe that the best thing
19 for our ITFS clients to be able to file during this filing
20 window would be for it to be delayed to some degree to allow
21 our clients to be served.

22 So that's where we stand.

23 MR. SCHWARTZ: All right. Are there audience
24 questions ready to go?

1 OPERATOR: Once again, if you like to ask a
2 question, press Star 1 now. We'll pause just a moment.

3 MR. SCHWARTZ: While we're waiting for audience
4 questions, John ---

5 MR. HIDLE: Yes.

6 MR. SCHWARTZ: What would you say the -- Are there
7 existing parts of CelPlan NREDX that do not work right
8 currently? You said it's slow? Is it effective?

9 MR. HIDLE: We're not absolutely certain. A
10 couple of things we do know that's not a problem with either
11 software package because we haven't received clarification
12 yet from the Commission about the use of the limited
13 exception to the waiver for reduction of the protective
14 service area based on existing interference, or the
15 so-called limited exception.

16 We do not yet believe there is an adequate
17 clarification of how to do that from the FCC, and we have
18 asked for such clarification. But it has not be
19 forthcoming. That's important in many of the major markets
20 where protective service areas overlap to be used in the
21 calculation of the interference with existing or incumbent
22 stations.

23 MR. SCHWARTZ: Some of our participants may not
24 understand what the limited exception is and why that's

1 important. Can you explain that?

2 MR. HIDLE: Yes. A 1995 order that expanded the
3 protective service area from a 15-mile radius to a 35-mile
4 radius included a special limited exception to the increased
5 PSA size which would be based on existing interference
6 between co-channel stations which, although their 15-mile
7 PSA's did not overlap, the new 35-mile PSA's did. And to
8 allow those stations some leeway for modification, the
9 limited exception allows for a -- creation of a 45 dB D to U
10 contour ratio line to redefine the area within the PSA where
11 interference exists between the existing facilities.

12 And in those areas where interference exists, then
13 modifications could be made, as long as there was no
14 increase in the geographic area receiving interference. In
15 other words, your existing interference-free area could not
16 be further reduced. That was the purpose of this limited
17 exception when the PSA was increased in size.

18 MR. SCHWARTZ: Well, (a) why does this matter and,
19 (b) what's the relevance with respect to software?

20 MR. HIDLE: Well, (a), the reason it matters is
21 because when PSA's overlap currently, there is interference
22 between the stations that reduces the area in which they can
23 maintain their 45 dB D to U. And when one station or
24 another station decides to expand into two-way service, of

1 course the two-way service would be most severely limited if
2 protection had to be accorded to areas in which interference
3 already existed. And it would be extremely difficult for
4 stations that are co-channelled with overlapping protective
5 service areas to be able to do much in the way of expanding
6 to a viable two-way system.

7 MR. SCHWARTZ: So you saying, when you prepare
8 applications, you really have to rely on this exception
9 extensively when the systems are closing packed?

10 MR. HIDDLE: That's exactly right. And the
11 relevance as far as the software is concerned is that,
12 although there was ways that each software package can
13 address the issue, it is still -- neither package of capital
14 of allowing you to calculate the contour ratio line as
15 required by the Commission. And that would have to be done
16 off line, either by specifically available software, or it
17 would have to be done manually, and the results entered into
18 each of the programs.

19 But neither -- Of course, neither software
20 manufacturer can actually provide that right at the moment
21 because it hasn't been totally clearly defined or clarified
22 by the Commission. But that is, indeed, a software issue
23 that enters into causing us to have to spend additional time
24 creating these modified PSA's, and entering them into the

1 software to be able to run the evaluations to the incumbent
2 systems.

3 MR. SCHWARTZ: Do we have any audience questions
4 yet, Operator?

5 OPERATOR: Not at this time. I would like to
6 remind everyone to press a Star 1. And now, we have a
7 question from Phil Duncan of National Conference on
8 Citizenship.

9 MR. SCHWARTZ: Phil, your line's open.

10 MR. DUNCAN: Hello, John?

11 MR. HIDLE: Hi.

12 MR. DUNCAN: This is Phil Duncan at NCOC. We have
13 licenses in seven markets. I'm not an engineer, obviously.
14 So forgive me. But if you've run -- if you've run both EDX
15 and CelPlan on any market, have they produced the same
16 results, or is there a variance, and is that variance
17 significant?

18 MR. HIDLE: Well, to answer that question, I'd
19 have to tell you that we have not actually run both packages
20 on the same market. We have been evaluating the EDX
21 software demonstration model so far, and we have not taken
22 the time to try to run the same design on both packages. So
23 I really couldn't tell you whether they give you the same
24 results or not.

1 MR. DUNCAN: Okay, thank you.

2 MR. HIDLE: Okay, you're welcome.

3 MR. SCHWARTZ: John, ITFS 20/20 has requested a
4 nine-month postponement of the window, which is roughly
5 double what the consulting engineers requested. Why does
6 this add up to the need for a nine-month delay?

7 MR. HIDLE: Well, it's a matter of how many
8 applications that we believe we can prepare, based on the
9 interest that we have received from the community. Of
10 course, we were expected to prepare applications in as many
11 as the top 100 markets, depending on from 1 to 4, to maybe
12 even 5 system applications per market. And that's a lot of
13 applications.

14 And we're also looking into the fact that we
15 bought the fastest computers we can and populated them with
16 the maximum random access memory, and running them over the
17 weekends and overnight, and so forth. We still came to the
18 conclusion that we'd need a lot of time to meet the demand
19 and the expectations.

20 And I might say that I think part of that was also
21 based on the fact that we've been receiving lots of calls
22 from ITFS licensees from around the country, asking us to
23 take on their application preparation. And of course, at
24 the moment, we don't believe we could do that in good

1 conscience because we know there's just not time.

2 MR. SCHWARTZ: All right, thank you very much,
3 John. And there will be opportunities to ask John further
4 questions after everybody has made their presentations.

5 Our next presenter is Leonhard Korowajeeuk. Have
6 I pronounced that right, Leonhard?

7 MR. KOROWAJEEUK: That's perfect.

8 MR. SCHWARTZ: Leonhard is the President of
9 CelPlan, and his full biography is available on the NIA web
10 site at www.itfs.org. Leonhard, your presentation?

11 MR. KOROWAJEEUK: Good afternoon, gentlemen. We
12 are participating in a very important event for the
13 telecommunications industry that, without doubt, will be a
14 cornerstone for the future development in the wireless
15 telecommunications. Not only the wireless licensing process
16 was changed of all parties, but for the first time, the
17 industry decided to tackle the peer to peer interference
18 issue. The FCC and the engineers that specified what we
19 call the methodology, or Appendix D, brilliantly addressed
20 this challenge.

21 We at CelPlan very quickly realized the importance
22 of this process, and accepted the challenge of developing
23 software tools that could materialize the methodology.
24 Today, we consider this methodology an important part of our

1 broadband technology, and this concept has been extended to
2 the whole broadband universe in terms of our tools.

3 It was not an easy task due to the difficulties
4 introduced by the peer to peer interference. Much of the
5 ground was already addressed in the methodology, and we just
6 had to build on top of it. CelPlan had the benefit of its
7 existing tools that provide the framework to add the new
8 functionality.

9 We started our development in September 1999, and
10 had our first on January 4, 2000. The availability of the
11 tool was publicly announced on February 17, at the NIA
12 Conference in Long Beach, and at the CTIA Trade Show
13 February 28th. On April 10, the tool was made commercially
14 available.

15 We licensed more than 10 entities, totalling more
16 than 150 licenses. We trained more than 100 engineers, and
17 those trained more engineers. Up to now, this software has
18 been used for more than 100,000 hours.

19 Our software is very user-friendly, and engineers
20 can start producing applications after two or three days of
21 training, even without the existence of user manuals.
22 Proficiency is achieved over a period of a month.

23 All these activities resulted in many software
24 revisions to address all the findings and functionality

1 request. This resulted in a very powerful tool, extremely
2 friendly and easy to use. We provided very powerful
3 analysis features that slashed the design time considerably.
4 Several optimizations were done to increase the processing
5 speed. We have actively contributed to the improvement in
6 the methodology revisions, which were frozen at the end of
7 April.

8 On June 2nd, we felt comfortable enough to freeze
9 the formulas and calculations until the filing window --
10 until the filing window release, 3.A07.

11 Any field analysis since then does not need to be
12 reworked to take exceptional degeneration of output files
13 which impact very little in time. Some previous study for
14 window-specific cases may have to be re-analyzed.

15 To the best of our knowledge, the software is
16 fully compliant with the methodology. It is very stable and
17 mature. It was internally tested by several parties and
18 experimented on different operational systems and many
19 machine brands.

20 To help in the accuracy and consistency analysis
21 by the independent parties, we introduced in the tools
22 additional text files containing intermediate and final
23 results.

24 We and other entities have designed hundreds of

1 markets, from super cell designs to complex motor cell ones.

2 We will continue to improve the tool to increase its
3 efficiency and to automate some procedures. This is the
4 case with the limited exception rule, also known as
5 grandfather interference.

6 Today, we generate a text file with all the
7 information, and all the user has to do is finalize the data
8 in a spreadsheet. Deportation of the methodology text files
9 is done manually today. We are in the processing of making
10 those two steps fully automatic.

11 The calculation of the protection of response
12 station (unintelligible) is not required into the filing
13 window, and we gave lower priority to it.

14 The software has been optimized in terms of speed,
15 and is extremely fast if you consider the calculations that
16 are involved. An RSA/PSA pair has generated more than 10
17 million parts that need to be calculated, each one with more
18 than 5,000 mathematical calculations. This gives about 50
19 billion calculations per pair. Each pair is processed today
20 in one to nine minutes, depending on the size of the RSA.

21 A complete study for small markets can be
22 processed in four hours, and for a very large market, in 30
23 hours. The major part of this time is computer processing
24 time, and the human intervention is limited to about 10

1 percent of it. Of course, we need to consider that there is
2 preparation time, and many iterations may be required to
3 clean interference in a market.

4 The methodology is the complete study -- is the
5 most complete issue to date, defining many parameters to
6 assure that everyone gets the same results in terms of
7 interference analysis. This does not mean that every step
8 in the process will be exactly the same when different
9 parties do the analysis. There are several factors that can
10 differentiate the results, like truncating, (unintelligible)
11 approximations, unit conversions, Centigrade, secondary
12 parameters, and bounding, and so on. Those parameters can
13 cause variation in intermediate results, but should not
14 affect the final analysis.

15 The interoperability issue has been addressed by
16 the FCC with the text file output, and it is natural that
17 small adjustment might be required when doing the
18 importation. Those adjustments will have to be addressed as
19 they arise, and this is being done already today.

20 We sincerely believe that our software is
21 sufficiently developed to design any ITFS and MMDS market
22 according to the rules of the methodology. And that
23 summarizes our position.

24 MR. SCHWARTZ: All right. Thank you very much,

1 Leonhard. Operator, do we have an audience question?

2 OPERATOR: Not at this time. I would like to
3 remind everyone to press Star 1 when you have a question.

4 MR. SCHWARTZ: And you can do this during a
5 presentation, if you like, so you can be queued up at the
6 beginning.

7 Leonard, let me just reprise a couple of the
8 things that you mentioned that caught my ear. You mentioned
9 a June 2nd freeze in the revisions to CelPlan with respect
10 to the computation algorithms; is that correct?

11 MR. KOROWAJEEUK: Yes.

12 MR. SCHWARTZ: Does that mean that there were
13 changes in the computation algorithms prior to June 2nd?

14 MR. KOROWAJEEUK: Yes, definitely.

15 MR. SCHWARTZ: And what sorts of changes were made
16 prior to that, and roughly, at what time?

17 MR. KOROWAJEEUK: Well, as I said, there were --
18 the methodology only was frozen on -- at end of April, and
19 we had to implement those changes. And then, of course, the
20 software has been used by many, many users, and there were
21 some feedbacks. So prior to June 2nd, there were changes
22 that could affect specific cases of the analysis, and those
23 cases, we informed our users. And those cases were rerun
24 and redone.

1 MR. SCHWARTZ: So it may be that substantial
2 amounts of work done prior to June 2nd had to be reworked by
3 the engineers?

4 MR. KOROWAJEUK: I wouldn't say substantial, but
5 some work, yes, had to be redone, and they depend on also on
6 what was the -- Each user has different ways of designing
7 things. And so, some cases had to maybe have a substantial
8 redesign. And those were a small percentage.

9 It depends also when you start. If you start in
10 February, of course. So as it progressed, less and less --
11 The changes affected less and less. And the changes closer
12 to June 2nd affected very few cases. Changes that we did in
13 February and January and March, of course, they probably
14 affected all the results. I would say that after the
15 methodology was frozen, two weeks later, we had -- we were
16 very, very close to the final solution. But some specific
17 cases that we did corrections or updates had to be rerun.

18 MR. SCHWARTZ: All right. Do we have any audience
19 question yet?

20 OPERATOR: We do. We have a question from Mark
21 GRANELL of Sprint.

22 MR. GRANELL: Leonhard, this is Mark Granell with
23 Sprint. My question is very basic. When you talk about
24 utilization of your tool, and the modifications that were

1 made, is it true that it was more of a rerunning of the
2 tool, as opposed to necessarily having to rebuild markets
3 and re-enter a conglomeration of data into the tool itself?

4 It was just a matter of essentially updating the version,
5 and maybe rerunning the market analysis?

6 MR. KOROWAJEEUK: Definitely. All our revisions,
7 they were compatible with the data that existed in the
8 previous revisions. So, basically, we would add more fields
9 to provide text for accuracy analysis and things like this,
10 or we would change some calculations because the methodology
11 changed during the process.

12 But basically, what the users had to do was to
13 take their existing project and just run it with the new
14 version, if it was affected.

15 MR. GRANELL: Thank you.

16 OPERATOR: And now, we'll hear a question from
17 Spencer Freund of California State University.

18 MR. FREUND: Yes. Good morning, good afternoon,
19 whatever it may be. A question concerning the issue of
20 interference. You mentioned -- at least what I thought I
21 heard you say was there would be no interference between
22 co-locations within the same region. Is that correct? In
23 other words, if one institution did an analysis, the same
24 should occur if, in fact, all resources are co-located in

1 the same site; is that true?

2 MR. KOROWAJEEUK: I certainly didn't say this.
3 And I would like you to repeat the question because I
4 definitely did not say something like this. Repeat, please?

5 MR. FREUND: Sure, by all means. I wanted to
6 know, you made mention of the issue of interference, that,
7 in fact, when you run an interference analysis, that sites
8 that are co-located -- at least, I thought I heard you say
9 that, should come up with the same numbers and the same
10 interference activities. Is that not the case, or is that
11 the case?

12 MR. KOROWAJEEUK: Sites that are co-located, are
13 you saying two RSA's, co-located RSA's?

14 MR. FREUND: Yes.

15 MR. KOROWAJEEUK: Or PSA's?

16 MR. FREUND: PSA's.

17 MR. KOROWAJEEUK: Two co-located PSA's, they
18 should come with the same interference? No, it's not
19 guaranteed. It depends.

20 MR. FREUND: Could you help me understand what
21 would be the issues where dependence is a problem? Where
22 would they not be the same?

23 MR. KOROWAJEEUK: Well, first, if they are
24 co-located, they'd certainly have different frequencies. So

1 they have different interference. Secondly, they might have
2 different characteristics. They can be located, but the
3 tower height can be different, the power can be different,
4 the antenna can be different, and so on.

5 So based on all of these, of course, you can have
6 totally different results even if they are co-located.

7 MR. SCHWARTZ: I want to keep us moving along
8 here. The main topic is software readiness, and I want to
9 keep the focus primarily on questions of that character, if
10 possible. Due to time, I'm going to skip to Merrill Weis.
11 There are further questions for Leonhard, there will be a
12 general audience question period following the individual
13 presentations.

14 Our next presenter is Merrill Weis. Merrill was
15 one of the principal technical consultants in the adoption
16 of the two-way rules. His full biography is available at
17 the NIA web site. Merrill?

18 MR. WEIS: Thank you, John. Let me start by
19 pointing out that the methodology is probably one of the
20 more complex pieces of rule-making that the FCC has done.
21 That information comes from the Commission itself, and from
22 others who have looked at it.

23 And it's that way for a reason, and that reason is
24 that the spectrum that we were dealing with to begin -- when

1 we started was already encumbered by a lot of operations.
2 There were already many licenses on all the channels
3 covering the bulk of the populated area of the country.

4 And so, what we set out to do was to develop a
5 technique by which we could take parts of that spectrum and
6 turn it around to use in a completely different orientation,
7 in a completely different direction for signal flow than had
8 been done previously, and at the same, endeavor to assure
9 that licensees got the same level of protection that they
10 had in the initial case.

11 In order to do that, we devised a very complex
12 algorithm, admittedly so, and presented it to the FCC. In
13 the process of working the rules and working the methodology
14 through the FCC and with FCC staff, the FCC saw fit to
15 increase the level of protection that's provided by the
16 methodology.

17 So where, initially, we started with a condition
18 that offered licensees an equivalent amount of interference
19 protection to what they had at the beginning, it is now, in
20 my estimation, overly protective by design. And that occurs
21 as a result of there being layers of worst-case instances on
22 top of one another. When I first put together the
23 methodology, in fact, I had myself put in a number of
24 worst-case parameters, and then, those were added to by the

1 FCC.

2 The point of this little discussion is that there
3 have been some people questioning whether or not the
4 software exactly follows the methodology, and whether there
5 might be some remaining areas in which the software does not
6 exactly follow the methodology. And the point is that, even
7 if that is so -- and I don't know that, that that is so; in
8 fact, I believe it not to be so, and I'll get to that in a
9 minute -- but even if that were so, then there are so many
10 layers of protection that the likelihood of either software
11 package missing the calculation according to the methodology
12 by a bit, and still resulting in interference is
13 infinitesimal because of those multiple layers of worst
14 cases that are piled on top of one another.

15 Let me point out that the different
16 implementations will - you know, even done correctly, will
17 product somewhat different results. That's because of, in
18 fact, some of the factors that Leonard mentioned where there
19 are different ways of doing things and still having them be
20 correct.

21 I mean, it's likely that we will, for some time,
22 continue to find some errors in the software. We are
23 currently engaged -- by Sprint, in fact -- in evaluating the
24 CelPlan software, and we have been literally taking it apart

1 and putting it back together again by looking at
2 intermediate results that it produces, and comparing them to
3 algorithms that we have written ourselves to manually work
4 through the various aspects of the methodology so that we
5 can then compare those intermediate results with what we see
6 from CelPlan, and then, looking at the reasonableness of
7 those results to see if they are close enough. And where
8 they are, and we move on; where they're not, then we provide
9 feedback to CelPlan.

10 In fact, we've done something very similar to that
11 over the years with EDX, and we've been using EDX software
12 since the early '90s. And even last year, for example, we
13 found an error in an EDX routine, and we passed it back to
14 EDX for them to incorporate into their software.

15 I'd point out that, despite errors in that
16 software -- which has been around since the early '90s --
17 showing up from time to time, nobody has had to refile
18 applications because of any of them.

19 So, bottom line, we're not trying to achieve
20 perfection here, only a reasonable level of comfort that the
21 software works properly. No software is perfect. We don't
22 expect this software to be perfect. But we're trying to
23 achieve a, as I say, a reasonable level of comfort. That's
24 what we were hired by Spring to do in this case, in order to

1 make -- to help them be comfortable that what they were
2 going to build and what they were going to ask their
3 partners to sign onto, would, in fact, offer adequate levels
4 of protection.

5 We believe, from what we've seen so far, that the
6 CelPlan software does a very good job of implementing the
7 methodology, and we continue to work our way through it, in
8 excruciating detail, to find the last little vestiges where
9 it may not, and where there may be some corrections that are
10 needed. And we'll probably continue to do that for a long
11 time.

12 That's not a reason for holding up the window.
13 That's not a reason for delaying things. We believe that,
14 from a good business standpoint, you have to, at some point,
15 go forward. And then, if you find something that is
16 problematic, you fix it, rather than delaying a massive
17 undertaking for the possibility that there might be a few
18 instances where something isn't exactly perfect.

19 So I think that's a summary of the approach that
20 we're taking. And, you know, when you look at this from the
21 standpoint of a business, it's the proper way for business
22 decisions to be made.

23 MR. SCHWARTZ: All right. Are there questions for
24 Merrill from the audience?

1 OPERATOR: Not at this time. I'd like to remind
2 everyone to press Star 1.

3 MR. SCHWARTZ: Merrill, you said that you're still
4 finding some errors in CelPlan software. Can you tell me
5 what the last three errors you found in CelPlan are?

6 MR. WEIS: John, actually, I didn't say that. I
7 said we're still looking for them.

8 MR. SCHWARTZ: Okay. Have you found any errors?

9 MR. WEIS: We've found errors over a period of
10 time. Some of them were in some of the very earliest of the
11 versions of the software. Those got fed back into CelPlan.
12 In fact, some of them were significant. That was in the
13 early stages. As far as I am aware, with the current
14 release of the software, we have found no errors that we're
15 currently working.

16 MR. SCHWARTZ: Okay. Well, you said the early
17 stages. Roughly, what are we talking about in terms of
18 time?

19 MR. WEIS: Well, we were working on this back in
20 January and February and March, before its commercial
21 release.

22 MR. SCHWARTZ: Um-hmm.

23 MR. WEIS: And at that point, yes, we found some
24 significant errors. That's part of what we were there to